



IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA

Western DIVISION

FILED

OCT 15 2010

DENNIS P. JAVARONE, CLERK
US DISTRICT COURT, EDNC
DEP CLK

Lucinda Lawrence)

_____)

_____)

(Enter above the full name
of the Plaintiff[s] in this
action).

Case No. 5:10-cv-379

(To be assigned
by the Clerk of
District Court)

vs.

Tiger Swan Inc.)

Brian Searcy)

James Reese)

_____)

(Enter above the full name of
ALL Defendant[s] in this action.
Fed.R.Civ.P.10(a) requires that
the caption of the complaint
include the names of **all** the
parties. Merely listing one
party and "et al." is insufficient.
Please attach additional sheets if
necessary).

COMPLAINT

1. Plaintiff resides at 45835 Debill Tenace
Sterling, VA 20166

2. Defendant(s) name(s): Tiger Swan Inc. - Brian Searcy
James Reese

Location of principal office(s) of the named defendant(s):

3452 Apex Parkway, Apex, NC 27502

Nature of defendant(s) business:

Contracting with
the U.S. Government and Corporate Clients

Approximate number of individuals employed by defendant:

400

3. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on this court by 42 U.S.C. § 2000e-5. Equitable and other relief are also sought under 42 U.S.C. § 20003-5(g).

4. The acts complained of in this suit concern:

(A) _____ Failure to employ me.

(B) ☒ Termination of my employment.

(C) _____ Failure to promote me.

(D) _____ Other acts as specified below:

5. Plaintiff is:

(A) _____ presently employed by the defendant.

(B) ☒ not presently employed by the defendant.

The dates of employment were 03/01/09 - 05/07/09

Employment was terminated because:

(1) ☒ plaintiff was discharged.

(2) _____ plaintiff was laid off.

(3) _____ plaintiff left job voluntarily.

6. Defendant(s) conduct is discriminatory with respect to the following:

(A) _____ my race.

(B) _____ my religion.

(C) ☒ my sex.

(D) _____ my national origin.

(E) _____ other as specified below:

7. The name(s), race, sex, and the position or title of the individual(s) who allegedly discriminated against me during the period of my employment with the defendant company is (are):

Brian Searcy and Henry Carpenter

8. The alleged discrimination occurred on or about

03/31/09-
05/07/09

9. The nature of my complaint, i.e., the manner in which the individuals(s) named above discriminated against me in terms of the conditions of my employment is as follows:

Former Program Director Henry Carpenter was very abusive towards me while working in Iraq. He would dramatize stories or create situations to cause ~~it~~ to look as though it was my fault. I was denied meal breaks, he told the guards I was ugly, wanted me to be a "Cleaning Lady," yell and swear or ignore me. He caused me to feel stupid when asking for further assistance. A former co-worker and Deputy Program Director Robert John Kennedy "JK" was given flexible hours and work schedule around his leisure time. He would find excuses to reprimand me, for example not having head-sets for the intranet meeting. I was also not taken seriously with regards to the assault & battery in Ft. Benning, GA.

10. The alleged illegal activity took place at: Tiger Swan Inc.
Iraq in the Baghdad office

11. I filed charges with the Equal Employment Opportunity Commission regarding defendant(s) alleged discriminatory conduct on or about May 2009. I have attached a copy of the Notice of Right to Sue letter issued by the Equal Employment Opportunity Commission. This letter was received by me on

June 30, 2010

12. I seek the following relief:

(A) _____ recovery of back pay;

(B) _____ reinstatement to my former job;

(C) X trial by jury on all issues so triable;

and any other relief as may be appropriate, including

injunctive orders, damages, costs and attorney's fees.

08/Sept./2010

Date

Lucinda Yancey

Signature of Plaintiff

45835 Debill Tenace

Sterling, VA 20166

571-297-1297-571-236-5556

Address and Phone Number of Plaintiff